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SEAN MILLER, JEFFREY MILEY, and KAMERON LEE

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

<b>THERESE L. LESHER,</b>	) Case No. 2:21-cv-00386-WBS-DMC
	)
Plaintiff,	) <b>STIPULATION AND ORDER EXTENDING</b>
	) <b>THE DATES FOR DISCOVERY CUTOFF AND</b>
vs.	) <b>DEADLINE TO FILE NON-DISCOVERY</b>
	) <b>MOTIONS IN CURRENT SCHEDULING</b>
<b>CITY OF ANDERSON, et al.,</b>	) <b>ORDER (ECF NO. 70)</b>
	)
Defendants.	)
	)

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Stip. and Order Extending the Dates for Discovery Cutoff and Deadline to File Non-Discovery Motions  
*Lesher v. City of Anderson, et al.*

USDC (E.D. Cal.) Case No.: 2:21-cv-00386-WBS-DMC

PURSUANT TO CIVIL LOCAL RULE 144 (Fed. R. Civ. P. 16(b)(1)(A)), THE PARTIES HEREBY RESPECTFULLY STIPULATE, THROUGH THEIR ATTORNEYS OF RECORD, AS FOLLOWS:

1. The parties have worked cooperatively together, in good faith, to accomplish the necessary discovery and depositions.
2. Due to circumstances out of the control of the parties or counsel, the parties wish to extend the deadlines for the cut off of discovery and non discovery motions by five months, respectively, which would cause the corresponding pretrial and trial dates to be extended out. For one, Plaintiff's counsel were not available for expert depositions during the month of July (due to depositions in other cases and prior obligations), thus requiring that the cutoff date be extended until December 16, 2024. Secondly, the parties' experts have limited availability. The difficulty in aligning the schedules of the parties' experts with counsels' schedules requires the extension.
3. Based on the logistical challenges that necessitate this extension, the parties respectfully stipulate and request that the following dates/deadlines be extended as follows:

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Event	Current Date/Deadline	Proposed Date/Deadline
Discovery Cutoff (Fact and Expert, including compliance with any Motion to Compel Order)	July 12, 2024	December 16, 2024
Deadline to file non-discovery Motions	July 12, 2024	November 1, 2024
Final PreTrial Conference	September 23, 2024	February 10, 2025
Trial	December 10, 2025	April 1, 2025

Respectfully Submitted,

Dated: September 3, 2024

**LAW OFFICE OF SANJAY S. SCHMIDT  
-and-  
LAW OFFICES OF PANOS LAGOS**

*/s/ Panos Lagos*

By: Panos Lagos  
Attorneys for Plaintiff,  
THERESE L. LESHER

Dated: September 3, 2024

**ANGELO, KILDAY & KILDUFF, LLP**

*/s/ Kevin J. Dehoff*

By: Kevin Dehoff  
KEVIN J. DEHOFF  
Attorneys for Defendants CITY OF ANDERSON,  
SEAN MILLER, JEFFREY MILEY, and  
KAMERON LEE

\*Pursuant to Local Rule 131(e), counsel has authorized submission of this document on counsel's behalf.

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**ORDER**

Pursuant to the parties' Stipulation and good cause appearing, the deadlines in this case are hereby modified by the Court as follows:

Event	Current Date/Deadline	Proposed Date/Deadline
Discovery Cutoff (Fact and Expert Including compliance with any Motion to Compel Order)	July 12, 2024	December 16, 2024
Deadline to file non-discovery Motions	July 12, 2024	November 1, 2024
Final PreTrial Conference	September 23, 2024	February 10, 2025, 1:30 pm
Trial	December 10, 2025	April 1, 2025, 9:00 am

**PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.**

Dated: September 3, 2024

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE